

**SIDLEY AUSTIN LLP**

Anthony Grossi  
Ameneh Bordi  
Juliana Hoffman\* (admitted *pro hac vice*)  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 839-5300  
Facsimile: (212) 839-5599  
Email: agrossi@sidley.com  
abordi@sidley.com  
jhoffman@sidley.com

*Counsel to the Foreign Representatives*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

China Evergrande Group, *et al.*,<sup>1</sup>

Debtors in Foreign Proceedings.

Chapter 15

Case No. 23-11332 (MEW)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION UNDER  
28 U.S.C. § 1746 REGARDING MOTION TO WITHDRAW VERIFIED  
PETITIONS FOR RECOGNITION AND DISMISS CHAPTER 15 CASES**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the undersigned hereby certifies as follows:

1. Responses to the *Motion to Withdraw Verified Petitions for Recognition and Dismiss Chapter 15 Cases* [Docket No. 20] (the “Motion”),<sup>2</sup> filed March 22, 2024, were due no

<sup>1</sup> The Debtors in these cases (the “Chapter 15 Cases”) are (i) China Evergrande Group (“Evergrande”), Tianji Holding Limited (“Tianji”), and Scenery Journey Limited (“Scenery Journey”).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Motion. As of the date hereof, the Foreign Proceedings are not currently pending before any Foreign Courts.

later than April 12, 2024 at 5:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). Local Rule 9075-2 provides that pleadings may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline; and (b) the attorney that filed the motion complies with the relevant procedural and notice requirements.

2. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, no responsive pleading to the Motion has been (a) filed with the Court on the docket of the above-captioned chapter 15 cases; or (b) served on the undersigned counsel.

3. Accordingly, the undersigned respectfully requests that the Court enter the proposed order, a copy of which is attached hereto as **Exhibit A**, granting the relief requested in the Motion.

*[Remainder of page intentionally left blank.]*

Dated: April 16, 2024  
New York, New York

**SIDLEY AUSTIN LLP**

*/s/ Anthony Grossi*

---

Anthony Grossi

Ameneh Bordi

Juliana Hoffman\* (admitted *pro hac vice*)

787 Seventh Avenue

New York, New York 10019

Telephone: (212) 839-5300

Facsimile: (212) 839-5599

Email: [agrossi@sidley.com](mailto:agrossi@sidley.com)

[abordi@sidley.com](mailto:abordi@sidley.com)

[jhoffman@sidley.com](mailto:jhoffman@sidley.com)

*Counsel to the Foreign Representatives*

*\*Admitted only in Texas*